

**BARCLAY DAMON** <sup>LLP</sup>

**Michael J. Case**  
Partner

June 14, 2023

**VIA ECF**

Hon. Naomi Reice Buchwald, U.S. D.J.  
U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: C.C.M.S. v. Oxford Realty & Holdings, LLC, et al.  
Case No.: 20-cv-03429 (NRB)  
BD File No.: 3111317

ENDORSEMENT

*Application granted.  
All deadlines are  
extended for two  
weeks.*

*Naomi Reice Buchwald*  
*USDS*

*June 15, 2023*

Dear Judge Buchwald:

On behalf of defendant Marc Paturet in the above-referenced matter, this is to request a brief extension of time to file a summary judgment motion on Mr. Paturet's behalf in this matter.

Because the undisputed evidence indicates that Mr. Paturet did not participate in the events at issue and indeed was out of the country at all times material to the Complaint, we initiated discussions with plaintiff's counsel in the first week of May regarding voluntary discontinuance of the action against Mr. Paturet. Yesterday evening, we first learned that plaintiff has declined to voluntarily dismiss Mr. Paturet. As a consequence, we plan to move for summary judgment as to Mr. Paturet.

Per the briefing schedule approved March 17, 2023, summary judgment motions are due June 16, 2023, just two days from now. We are mindful of Your Honor's admonition in the endorsement approving the briefing schedule, that "no adjournments will be granted." However, in view of the exigent circumstances noted above, we respectfully request a brief extension, as to Mr. Paturet only, of the current June 16, 2023 filing date, to permit us to prepare and file a summary judgment motion on or before June 30, 2023.

Respectfully submitted,



Michael J. Case

MJC: djm

Cc: All counsel via ECF

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